

WALTER S. CALWELL, ASSIGNEE	*	IN THE CIRCUIT COURT FOR
	*	
VS.	*	FREDERICK COUNTY
	*	
FRANCIS B. YOUNG and	*	IN EQUITY No. 21,047
JANE I. YOUNG, his wife	*	

P E T I T I O N

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Petition of Walter S. Calwell, Assignee, Plaintiff, in this cause, by his Solicitors, Callahan, Calwell and Laudeman, respectfully represents:

1. That Francis B. Young and Jane I. Young, his wife, the Defendants herein are now the record title owners of fee simple property situate in the Town of Jefferson, Frederick County, known as 100 Main Street, having purchased said property by deed dated April 1, 1960 from Marie Culler Corun and Heisely B. Corun, duly recorded among the Land Records of Frederick County, the purchase price of said property financed by a purchase money mortgage for \$13,450.00, executed, dated and delivered on April 1, 1960 to Sumner G. Whittier, as Administrator of Veterans' Affairs, and recorded among the Land Records of Frederick County in Liber ECW 635 folio 417, assigned to Baltimore Federal Savings and Loan Association by Assignment dated July 25, 1963 and duly recorded among the aforesaid Land Records, subsequently vested in the Plaintiff herein for the purpose of foreclosure by virtue of Short Assignment dated July 15, 1965 and duly recorded among the aforesaid Land Records, and filed among the papers in this cause as "Plaintiff's Exhibit 'A'".

2. That said mortgage is in default for the non-payment of monthly payments of principal, interest and property expense due under said mortgage from January, 1965 to August, 1965, a period of eight months, representing a total arrearage of \$776.00, and the present unpaid indebtedness due on said mortgage is \$12,492.10.

3. That the payment of said mortgage was guaranteed by the Veterans Administration under the provisions of the Servicemens' Readjustment